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July 9, 2001

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Application by Verizon New York Inc. for Authorization To Provide In-Region,
InterLATA Services in State of Pennsylvania, Docket No. 01-138

Dear Ms. Salas:

In response to requests from Ms. Attwood and the CCB staff, Verizon is providing the enclosed. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-1486.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".

Enclosures

cc: R. Tanner
K. Farroba
D. Attwood
B. Olson
M. Carey
A. Johns
S. Pie
J. Nitsche
J. Jackson

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July 9, 2001

Ex Parte

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Application By Verizon Pennsylvania Inc. For Authorization to Provide In-Region, InterLATA Services in Pennsylvania, CC Docket No. 01-138

Dear Ms. Attwood:

This letter responds to Staff's request for information about Verizon's plans to make DSL available for resale over resold voice lines in Pennsylvania. As Verizon explained in its Application, Verizon Advanced Data Inc. (VADI) does not have an obligation to make its DSL service available for resale where other carriers are providing the voice service on the line. Application at 54. Nevertheless, VADI will voluntarily make available such a service for resale throughout the former Bell Atlantic service areas in Pennsylvania, called "Verizon DSL over Resold Lines," in the manner described below. This offering will enable resellers of Verizon's voice service to offer to their end users resold DSL on existing resold voice lines where facilities are available that are suitable for use to provide VADI's DSL service.

Resellers will pre-order and order Verizon DSL over Resold Lines for existing resold voice lines using the existing interfaces (either FTP or VADI's graphical user interface) that VADI makes available to its ISP customers. In turn, VADI will provide resellers with the same notices it provides to its other ISP customers. Finally, VADI will bill resellers for Verizon DSL over Resold Lines using the same mechanisms that it uses to bill its ISP customers. Because these systems and processes are different than those used by Verizon for resale of its services, and because additional steps are required to turn-up the service, this service will be excluded from all reported performance measurements. (Resellers will continue to pre-order and order voice lines for resale as they do today, using the Web GUI, CORBA, or EDI interfaces Verizon provides to CLECs. For resold voice lines, Verizon will continue to provide notifiers and to bill CLECs as it does today.)

Verizon provided an illustrative tariff for this service in connection with its pending section 271 application for Connecticut on July 6, 2001. A copy of that illustrative tariff is attached to this letter. Verizon currently serves only 60,000 access lines in Connecticut. In Pennsylvania, in contrast, Verizon serves approximately 6,200,000 access lines in the former Bell Atlantic service areas, more than 100 times the number in Connecticut. Consequently, while Verizon is prepared to provide this service in Pennsylvania today at the same level of demand that it will receive in Connecticut, it is possible that the demand in Pennsylvania will be larger than the demand in Connecticut.

Because of the size of the Pennsylvania market and the large and diverse number of carriers operating in that state, Verizon and VADI have designed an implementation plan for Pennsylvania that will strive to automate as much of the process as possible. It also includes resellers in virtually every stage of the process so that the new service is one to which resellers can provide input. This is similar to the implementation process that the Commission has approved for use with other new service offerings. See *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Third Report and Order on Reconsideration, 16 FCC Rcd 2101 (2001), at ¶¶ 21-22; *Application of Verizon New England Inc., et al. For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, Memorandum Opinion and Order, FCC No. 01-130 (rel. April 16, 2001), at ¶¶ 180-181. Finally, because Verizon and VADI will be providing this service in Connecticut beginning July 16, 2001, Verizon will have an opportunity to draw on its experience in Connecticut while fully developing its automated process for Pennsylvania.

The implementation process will commence immediately and will proceed in stages. This week, Verizon and VADI are evaluating existing system restrictions in Pennsylvania that could affect the ordering, provisioning, and maintenance of Verizon DSL over Resold Lines. Verizon and VADI also have begun contacting resellers seeking the participation of three resellers in a cooperative production trial in Pennsylvania of the recommended systems and methodology for Verizon DSL over Resold Lines.

Beginning July 23, 2001, Verizon and VADI will work with resellers that have agreed to participate in the Pennsylvania cooperative production trial to design a plan, including selecting trial cases and developing the trial procedures. At the same time on a parallel track, Verizon and VADI will be reviewing existing internal methods, procedures and training required for ordering, provisioning, and maintenance of this service in Pennsylvania, will begin determining what new ones are required and will develop the training requirements and materials for Verizon's and VADI's ordering, provisioning, and maintenance employees.

On August 10, 2001, Verizon and VADI are planning a workshop for communication about this service to all interested resellers in Pennsylvania. In addition, beginning August 10, Verizon and VADI will conduct necessary training for employees who will be processing orders, provisioning, and maintaining this service. Verizon and VADI will continue discussions and planning for the cooperative production trial with the resellers that have agreed to participate in the Pennsylvania trial.

On August 18, 2001, Verizon will implement the Phase I system changes needed for this service. Verizon and VADI will conduct internal pre-production testing between August 18 and August 24. On August 24, the resellers participating in the cooperative production trial will begin submitting orders for Verizon DSL over Resold Lines, and Verizon and VADI will begin processing and provisioning these service requests. During the trial, Verizon, VADI, and the participating resellers will evaluate and validate the service requests to determine if results met expectations or if changes are required to provide the service as described above efficiently. If the trial criteria are not met, the participants, including the resellers, will identify the issues that must be addressed through system changes or establishing new processes or procedures, will implement them, and redo the test. This permits resellers to have input into any new test design.

If the cooperative production trial is successful, VADI will begin accepting commercial production orders for Verizon DSL over Resold Lines by September 7, 2001 in Pennsylvania. In order to ensure that orders can be processed and provisioned properly once commercial availability begins, initial order volumes for LSRs that involve manual processing by Verizon or VADI will be subject to caps that will ramp up until systems and software enhancements can be developed and implemented. For the first two weeks, LSRs will be limited to 30 per business day to allow resellers, Verizon, and VADI to obtain experience submitting and processing commercial orders, drawing on the results of the test. For the second two weeks, LSRs will be limited to 50 per business day. This will allow resellers, Verizon, and VADI to begin ramping up volumes, drawing on the first two weeks of commercial experience. For the third two week period, LSRs will be limited to 100 per business day.

At the end of this period, on October 19, 2001, Verizon, VADI, and any resellers that are submitting orders for Verizon DSL over Resold Lines will assess the volumes being submitted and the caps to determine if orders are being handled efficiently and whether changes are needed. Verizon anticipates that, at that point, the limit on LSRs will be increased to 200 per business day until systems and software enhancements can be developed and implemented, a period that Verizon expects to take approximately three months. While this is a new service for which demand is unknown, Verizon and VADI expect that this volume will be more than adequate. For example, this volume would have Verizon and VADI handle more LSRs for Verizon DSL over Resold Lines in one day than the current number of line shared lines CLECs order in Pennsylvania in an entire month. Moreover, this number is more than 50% of the approximately 380 LSRs for *all* resale POTS (which include feature changes as well as newly resold lines) that Verizon handles each day in Pennsylvania.

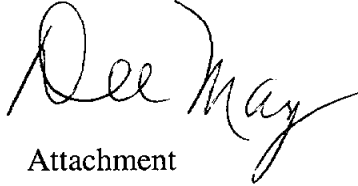
This offering is contingent on the Commission's grant of Special Temporary Authority for relief from the conditions in the Bell Atlantic/GTE Merger Order.¹ Verizon and VADI will file a request for such Special Temporary Authority separately. This offering is also contingent on the Pennsylvania Public Utility Commission's concurrence that the offering does not violate the PUC's existing structural separation requirement for VADI. This is an interim arrangement until a more permanent arrangement can be developed through collaboratives and the change management process.

¹ *GTE Corp.*, 15 FCC Rcd 14032, App. D (2000).

As explained above, VADI will file a tariff for the former Bell Atlantic service areas in Pennsylvania, similar to the illustrative tariff it filed for Connecticut, prior to the start of the initial commercial availability period. As in Connecticut, the service provided by VADI will be the transport service defined in the tariff. As shown in the attached illustrative tariff for Connecticut, there will be both recurring and non-recurring charges for this service. The recurring charges will be VADI's month-to-month charge for DSL service, minus the applicable resale discount in Pennsylvania. At present, the non-recurring charges will be VADI's existing tariffed non-recurring charges (as applicable), minus the applicable resale discount in Pennsylvania. VADI may in the future seek an additional non-recurring charge because the existing non-recurring charges likely do not fully capture the costs of providing this new service. As is also shown in the illustrative tariff, the reseller will be responsible for providing any necessary customer premises equipment and work at the customer premises.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dee May".

Attachment

cc: R. Tanner
K. Farroba
B. Olson
M. Carey
A. Johns
S. Pie
J. Nitsche
J. Jackson

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**5.2 Verizon DSL Over Resold Lines**

This service is offered over resold voice lines that terminate on end user premises in the following state: Connecticut.

Verizon DRL is available only to carriers that have an existing resold voice line and seek to engage in the resale of voice and data on a combined basis pursuant to 47 U.S.C. §251(c)(4). Consequently, for purposes of this service, the term "customer" is defined as a telecommunications carrier that resells voice services pursuant to 47 U.S.C. § 251(c)(4).

5.2.1 Service Description

- A. Verizon DSL Over Resold Lines (DRL) is a data access service. It uses DSL technology to transport data over compatible copper facilities that are concurrently used to provide resold voice services to the same end user premises. Data traffic generated by a customer-provided modem is transported to the Verizon DRL Connection Point. From there, the traffic is transported to the end user's information service provider (ISP) or content provider via other Company services.

Issued: Illustrative 7/X/01

Effective:

by:

John S. Cullina
Secretary and General Counsel
Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**5.2 Verizon DSL Over Resold Lines (Continued)****5.2.1 Service Description (Continued)**

- B. Six types of Verizon DRL are available based on the upstream and downstream speed combinations chosen by the customer.
1. Verizon DRL 768K/128K provides maximum speeds of 768 Kilobits Per Second (Kbps) downstream and 128 Kbps upstream.
 2. Verizon DRL 1.5M/384K provides maximum speeds of 1.544 Megabits per second (Mbps) downstream and 128 Kbps upstream.
 3. Verizon DRL 1.5M/384K provides maximum speeds of 1.544 Mbps downstream and 384 Kbps upstream.
 4. Verizon DRL 7.1M/768K provides maximum speeds of 7.1 Mbps downstream and 768 Kbps upstream.
 5. Verizon DRL 384K/384K provides maximum speeds of 384 Kbps downstream and 384 Kbps upstream.
 6. Verizon DRL 768K/768K provides maximum speeds of 768 Kbps downstream and 768 Kbps upstream.

The data speeds listed above are maximum speeds. Actual speeds may be lower due to the impact of loop distance, modem technology and other factors. Therefore, performance levels cannot be guaranteed. This includes data speeds, throughput, and packet loss.

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John S. Cullina
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Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**5.2 Verizon DSL Over Resold Lines (Continued)****5.2.2 Terms and Conditions**

- A. Verizon DRL is available only where suitable facilities are available to an end user premises.
- B. Company will provision and maintain Verizon DRL from the Verizon DRL Connection Point to the network interface device at the designated end user premises. Company will advise Customer of any additional equipment necessary to support Verizon DRL. Customer is responsible for obtaining the necessary additional equipment, including any required splitters or filter and a compatible DSL modem.
- C. Customer will provide the Company with the necessary information (e.g., name and address/location, telephone number of the resold voice circuit, , serving area, etc., related to end user and ISP/Content Provider) to provision Verizon DRL.
- D. Verizon DRL will be provisioned over copper facilities where such facilities are available that are suitable for the service and over which Customer is also providing resold voice service pursuant to 47 U.S.C. §251(c)(4); Customer must provide resold voice service to the same end user premises over such facility at the time of ordering Verizon DRL. Verizon DRL will be disconnected if Customer no longer provides resold voice service over such facility.
- E. Company will obtain qualification information on facilities to determine the suitability of such facilities for Verizon DRL. Company will not provide Verizon DRL on facilities that are unsuitable for the service, nor will Company provide Verizon DRL if it determines that such provision will produce interference to other services.
- F. Verizon DRL will be provided subject to the availability and limitations of Company facilities and related equipment.
- G. Company reserves the right to interrupt temporarily Verizon DRL for maintenance, software upgrades, and in emergency situations.
- H. Customer will obtain from the end user authorization to provide Verizon DRL over that end user's voice line, and to allow Company employees or its authorized agents to enter end user's designated premises at any reasonable hour for the purpose of installing, inspecting, or repairing Verizon DRL arrangement. Customer will also obtain permission from the end user, upon termination of Verizon DRL, to allow Company employees or its authorized agents to enter the premises at a reasonable hour to remove any Company equipment. Customer will present evidence of such authorizations to the Company upon request. Company may terminate Verizon DRL in the event such authorizations are not obtained and maintained.

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Effective:

by:

John S. Cullina
Secretary and General Counsel
Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III

Verizon DSL Over Resold Lines (Continued)

5.2.3 Rate Regulations

- A. Monthly Rate - A monthly recurring charge applies for each Verizon DRL arrangement.
- B. Service Activation - A nonrecurring charge applies for the initial service activation associated with each Verizon DRL arrangement ordered.
- C. ISP/Content Provider Charge - A nonrecurring charge also applies for activities associated with a change in ISP/Content Provider for each Verizon DRL arrangement changed.
- D. Speed Change Downward - A nonrecurring charge applies for activities associated with a downward change in speed from one service type to another with each Verizon DRL arrangement changed.
- E. Speed Change-Upward - There is not a charge applied for activities associated with an upward change in speed from one service type to another service type.
- F. Software Change - A nonrecurring charge applies for a software change associated with the remapping of circuit information or other software changes associated with a Verizon DRL arrangement. This charge is applied on a per software change basis.

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Effective:

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John S. Cullina
Secretary and General Counsel
Arlington, VA 22201

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)
PART III**Verizon DSL Over Resold Lines (Continued)****5.2.4 Rates and Charges****A. Month-to-Month ***

	<u>Monthly Rate</u>
Verizon DRL 768K/128K	\$ 39.95
Verizon DRL 1.5M/128K	43.95
Verizon DRL 1.5M/384K	48.95
Verizon DRL 7.1M/768K	109.95
Verizon DRL 384K/384K	46.00
Verizon DRL 768K/768K	80.00

B. Nonrecurring Charges *

1. Service Activation	\$ 60.00
2. ISP/Content Provider Change	60.00
3. Speed Change - Downward	35.00
4. Speed Change - Upward	00.00
5. Software Change	6.00

* Rates are subject to any appropriate wholesale discount established in the state pursuant to 47 U.S.C. §251(c)(4).

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